

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Case No. 21-cv-1445 (DSD/KMM)

UNITED STATES SECURITIES)
AND EXCHANGE COMMISSION,)

Plaintiff,)

v.)

MARK A. MILLER, SAIED)
JABERIAN, and CHRISTOPHER J.)
RAJKARAN,)

Defendants.)

**GOVERNMENT'S UNOPPOSED
MOTION TO INTERVENE AND
FOR A STAY OF PROCEEDINGS**

The United States of America, by and through its attorneys, Charles J. Kovats, Jr., Acting United States Attorney for the District of Minnesota, and Joseph H. Thompson and Miranda E. Dugi, Assistant United States Attorneys, respectfully seeks an order of this Court (a) permitting the United States to intervene in this matter, and (b) temporarily staying discovery in this case until the resolution of related, criminal litigation. This motion is unopposed and based on the Government's Memorandum in Support of Motion to Intervene and for a Stay of Proceedings.

Dated: November 12, 2021

Respectfully submitted,

CHARLES J. KOVATS, JR.
Acting United States Attorney

BY: /s/ Joseph H. Thompson
JOSEPH H. THOMPSON
MIRANDA E. DUGI
Assistant U.S. Attorneys